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Original

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The Law Offices of SPERO T. LAPPAS
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By: SPERO T. LAPPAS, Esquire
Pa. Supreme Court identification no. 25745

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG,
Plaintiff

v.

COUNTY OF DAUPHIN,
DAUPHIN COUNTY SHERIFF'S
DEPARTMENT,
RALPH McALLISTER,
Defendants

CIVIL ACTION NO. 4:CV-01-0967

JURY TRIAL DEMANDED **FILED**
HARRISBURG, PA

DEC 17 2001

(JUDGE RAMBO) MARY E. D'ANDREA, CLERK
Per Deputy Clerk

MOTION TO ENLARGE DISCOVERY PERIOD

1. The discovery period previously set by Judge McClure expires January 2, 2002.
2. The Court's recent Order provides for the filing of the Amended Complaint on or before February 10, 2002.
3. Judge McClure's scheduling order requires that requests to enlarge discovery be filed on or before December 15, 2001.

WHEREFORE, Plaintiff requests that the discovery deadline be extended to March 30, 2002.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

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By: SPERO T. LAPPAS, Esquire
Pa. Supreme Court identification no. 25745
ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONCURRENCE/NON-CONCURRENCE

I hereby certify that on December 17, 2001 I contacted or attempted to contact opposing counsel JAMES YOUNG, Esquire, and MICHAEL KANE, Esquire, and sought concurrence in the attached motion.

Concurrence was granted by ATTORNEY YOUNG.

Concurrence or non-concurrence from ATTORNEY KANE could not be obtained because he was unavailable. Additional attempts will be made to obtain concurrence of non-concurrence and a further certificate filed with the court as soon as possible. Opposing counsel is requested to call the undersigned upon receipt of this motion to advise of his position regarding concurrence or non-concurrence in the attached motion.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By: 

The Law Offices of SPERO T. LAPPAS